The Honorable Ronald B. Leighton

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT TACOMA

SHELLEY DENTON, and all others similarly situated,

Plaintiff,

VS.

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DEPARTMENT STORES NATIONAL BANK,

Defendant.

No. 3:10-cv-05830-RBL

RULE 7.1 CORPORATE DISCLOSURE STATEMENT OF DEFENDANT DEPARTMENT STORES NATIONAL BANK

Under Rule 7.1 of the Federal Rules of Civil Procedure, Defendant Department Stores National Bank ("DSNB") states that Citibank (South Dakota), N.A., a non-public bank, owns 100% of the common stock of DSNB; and that Citigroup, Inc., a public company not owned by any parent company or by any publicly-held corporation owning 10% or more of its stock, in turn owns 100% of the common stock of Citibank (South Dakota), N.A. In addition, Macy's, Inc., owns 49% of a class of non-voting preferred stock of DSNB, but has no equity interest in DSNB. Macy's, Inc. is not owned by any parent corporation or by any publicly held corporation owning 10% or more of its stock.

RULE 7.1 CORPORATE DISCLOSURE STATEMENT OF DEFENDANT DEPARTMENT STORES NATIONAL BANK No. 3:10-cy-05830 RBL - 1 -

WILMER CUTLER PICKERING HALE AND DORR LLP 399 Park Avenue New York, NY 10022 (212) 230-8800

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1	March 14, 2011	
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4		Respectfully submitted,
5		s/ Robert W. Trenchard
6		
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27	RULE 7.1 CORPORATE DISCLOSURE	- 2 - Wilmer Cutler Pickering Hale and Dorr lli
28	STATEMENT OF DEFENDANT DEPARTMENT STORES NATIONAL BANK	399 Park Avenue New York, NY 10022

No. 3:10-cv-05830 RBL

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1 CERTIFICATE OF SERVICE 2 I hereby certify that on March 14, 2011, I electronically filed the foregoing with the Clerk 3 of the Court using the CM/ECF system which will send notification of such filing to the 4 following: 5 Deborah M Nelson Rachel J Geman Nelson Boyd PLLC Lieff Cabraser Heimann & Bernstein (NY) 1700 Seventh Avenue, Suite 2220 250 Hudson Street, 8th Floor Seattle, WA 98101 New York, NY 10013-1413 7 206-971-7601 212-355-9500 nelson@nelsonboydlaw.com rgeman@lchb.com 8 Jeffrey D. Boyd Randall K Pulliam 9 Nelson Boyd PLLC Carney Williams Bates Bozeman & Pulliam, 1700 Seventh Avenue, Suite 2220 PLLC 10 Seattle, WA 98101 11311 Arcade Drive, Suite 200 206-971-7601 Little Rock, AR 72212 11 boyd@nelsonboydlaw.com 501-312-8500 rpulliam@carneywilliams.com 12 Kenneth J Grunfeld Golomb & Honik, PC 13 1515 Market Street, Suite 1100 Philadelphia, PA 19102 14 215-985-9177 kgrunfeld@golombhonik.com 15 16 and I hereby certify that I am aware of no non-CM/ECF participants to whom this document 17 should be mailed by United States Postal Service. 18 DATED: March 14, 2011 s/ Robert W. Trenchard 19 ROBERT W. TRENCHARD (N.Y. Bar No. 2679488) (admitted pro hac vice) 20 WILMER CUTLER PICKERING HALE AND DORR LLP 21 399 Park Avenue New York, NY 10022 22 Tel: (212) 230-8800 Fax: (212) 230-8888 23 Robert.Trenchard@wilmerhale.com 24 Counsel for Defendant Department Stores National 25 Bank 26 27 CERTIFICATE OF SERVICE - 1 -WILMER CUTLER PICKERING HALE AND DORR LLP No. 3:10-cv-05830 RBL 399 Park Avenue 28 New York, NY 10022

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